

## APPENDIX 3 – REPRESENTATION FORM

	<b>Solihull MBC Local Plan</b>  Publication Stage Representation Form	<b>Ref:</b>  <b>(For official use only)</b>
<b>Name of the Local Plan to which this representation relates:</b>	Solihull Local Plan – Draft Submission Plan October 2020	
<b>Please return to <a href="mailto:psp@solihull.gov.uk">psp@solihull.gov.uk</a> or Policy and Engagement, Solihull MBC, Solihull, B91 3QB BY Monday 14<sup>th</sup> December 23:59</b>		
This form has two parts –  Part A – Personal Details: need only be completed once.  Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.		
<b>Part A</b>		
<b>1. Personal Details*</b>	Messrs	<b>2. Agent's Details (if applicable)</b>
Title	Dr	
First Name	<b>Kavita</b>	
Last Name	<b>Goswami</b>	
Job Title	Company secretary / owner	
Organisation	<b>Lansdowne Property developers limited</b>	
<b>Address Line 1</b>	██████████	
Line 2	████ █████ ██████████	

Line 3	██████	
Post Code	██████	
Telephone Number	██████████	
E-mail Address	██████████ ██████	████████████████████

**Part B – Please use a separate sheet for each representation**

**Name or Organisation:**

Dr Kavita Goswami c/o Lansdowne Property Developers limited

3. To which part of the Local Plan does this representation relate?

Paragraph	720 to 729	Policy	KN2	Policies Map	Concept Masterplan for Knowle Oct. 2020
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes			No	X
4.(2) Sound	Yes			No	X

4 (3) Complies with the

Duty to co-operate

Yes ✓

~~No~~

**5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

**Masterplan Proposals**

The Allocation KN2 is considered to be unsound when bound by the Indicative

Masterplan that inappropriately identifies the Lansdowne site (1806 Warwick Road, Knowle B93 0DT) as contributing toward the delivery of land for the replacement Arden Academy and new Primary School education development.

**6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

Allocation Policy KN2 requires modification to be found sound. Failure to modify the allocation and accompanying paragraphs 720 -729 to take account of the points raised in these representation will render the plan challengeable and unsound. The accompanying Concept Masterplan KN2 also requires redrafting to be relatable to the documented evidence base and to demonstrate the allocation is deliverable.

We strongly recommend that the Concept Masterplan for Allocation KN2 is amended or removed. Without these changes the Concept Masterplan included is at risk of jeopardising the deliverability and reliance of the proposed strategic allocation. Failure to provide sufficient flexibility at this early stage could jeopardise the proposed allocations through a risk of challenge to the development extents and impacts arising. As such, to make the plan sound the reliance upon Concept Masterplan KN2 should be removed or the masterplan amended to ensure constraints can be appropriately assessed and impacts quantified, within adequate mitigation and infrastructure provision allowed for.

The Allocation proposals for the Arden Triangle site should be suitably amended to respond to these considerations so that the educational development is either kept on its existing site or relocated on the Council's own site within the allocation. Such a relocation will enable the delivery of the education facilities within the required timetable and to the standard required; without the ensured delivery of these educational facilities the strategic allocation of this site and the infrastructure it is intended to deliver is undermined. Similarly, the reasoning for the site's Green Belt release is also detrimentally affected.

It is recommended that further consideration of alternatives is undertaken, particularly with respect to the delivery of a new Arden Academy within the School's existing landholdings. Until the Council has agreement of the allocation masterplan, the policy should not rely upon the accompanying masterplan document to secure the various components of the allocation.

Specific alteration to paragraph 724 is also recommended.

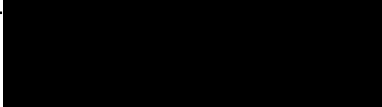
**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

**7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

<input type="checkbox"/>	No, I do not wish to participate in hearing session(s)	<input checked="" type="checkbox"/>	Yes, I wish to participate in hearing session(s)
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**8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

Given the complex factors affecting the Allocation's consideration and the incorrect consideration of Messrs Goswami's proposals for their land interests by the Council in the past, it is considered to be necessary to address the examination directly through participation in the relevant Hearing Session.

<b>9. Signature:</b>	 ( Dr. Kavita Goswami)	Date:	14 Dec 2020
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